

REMARKS

Applicant has carefully reviewed the Office Action dated August 24, 2006. Applicant has amended Claims 44 and 70. Thus, Claims 44-70 remain pending in the application. Reconsideration of the claims, as amended, is respectfully requested.

Claim 44 was objected to for an informality in Line 7. The Applicant has amended the claim as suggested by the Official Action.

Claims 44-64 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Jalili* in view of *Mizoguchi* and Claims 65-70 were rejected under 35 U.S.C. § 102(e) as being anticipated by *Jalili*. Applicant respectfully traverses. Claim 44 includes the limitation of:

transmitting, after each selection of each of the multiple points in the graphical image, coordinates associated with a portion of the security code from the client to the server over the connection, the coordinates further associated with such selection of such point.

In the response to arguments portion of the Official Action, this language was interpreted to mean that “all icons are selected before transmissions of the selected icons from the transmission to the server.” This is not an accurate interpretation of the claim language. Applicant believes that this claim language states that coordinates associated with a portion of the security code are transmitted after each selection of each of the multiple points. Thus, a four digit security code being transmitted from the client to the server would involve the selection of a first portion of the code which would then be transmitted to the server, the selection of a second portion of the code which would then be transmitted to the server, the selection of the third portion of the code which would then be transmitted to the server, and the transmission of the fourth portion which would then be transmitted to the server. Thus, Applicant’s claim describes the transmission of coordinates associated with a selected portion of a security code after the selection of each portion of the security code rather than transmission of the entire security code after the entire code has been selected at the client.

The *Jalili* reference does not describe the transmission of the security code one icon at a time as recited in the Official Action. The reference to Figure 9 describes that the “client 910 transmits the icon location information 940 to the server 920 over the internet 930.” This does not describe the transmission of individual icons of a code from the clients to the server. This information refers to the entirety of the icon location information associated with each of the icons in the code that is transmitted from the client to the server. Nothing within the description of Figure 9 indicates that the icon information is individually transmitted from the client to the server after the selection of each icon. This interpretation is supported by other language within the *Jalili* reference such as that at Column 8, Lines 55-63 which recites: “with the user’s pin of ‘5263’, the user would point and click first the cross, then the circle, then the right triangle and then the square. This will act to select a point in each icon 230 in the form of location information. This location information is then transmitted or communicated to the server in the form, for example, of particular points in the icon 230 such as those listed in the session list 212 in Figure 7.” This portion of the specification clearly indicates that the location information associated with each of the portions of the code is transmitted at the same time after their selection at the client. The description with respect to Figure 9 does not overcome this explanation. Therefore, the Applicant respectfully submits that the *Jalili* reference does not describe the transmission of coordinates associated with a portion of a security code after each selection of a portion of the security code.

Likewise, the *Mizoguchi* reference describes a process wherein each image of a number of images are selected prior to the transmission of this group of selected images from the client to the server. Applicant argues that, as with respect to *Jalili*, *Mizoguchi* does not describe transmission of coordinate information with respect to each selected image after selection of that image, but rather describes selection of all of the images associated with a code and then the transmission of this information together in its entirety. Therefore, the Applicant respectfully submits that Claims 40 and 54 (which includes similar limitations), and all claims dependent therefrom, are distinguishable over the art of record, and a Notice of Allowance is respectfully requested.

Claim 65 recites the limitation of “receiving after each selection of each of the multiple points in the graphical image coordinates associated with a portion of the security code at the receiver of a connection, the coordinates further associated with such selection of such point.” Applicant respectfully submits that this limitation is not disclosed by the combination of *Jalili* and *Mizoguchi*. As described previously, the *Jalili* and *Mizoguchi* references do not describe the transmission of selections from a server to a client after each selection of an icon or image within the client, but instead describes the transmission of the entirety of the information after it has been entirely selected at the client. Therefore, the Applicant respectfully submits that Claim 65, and all claims dependent therefrom, are distinguishable from the art of record and a Notice of Allowance is respectfully requested.

Claim 70 recites the step of “storing the selection if the selection does not indicate an end of input and repeating steps (a) and (b); “and” sending stored selections to the server if the selection indicates the end of input.” The discussion of *Jalili* provided in the Official Action does not reference the claim’s reliance upon a selection indicating an end of input to perform the storing and sending steps. If the selection does not indicate an end of input the storing step is performed. If the selection indicates the end of input, the sending step is performed. Performing one or the other of these steps based upon an indication of an end of input is not described within the *Jalili* reference. The Official Action indicates that *Jalili* suggests storing and then determining whether the password is the password that is stored. While this may or may not be true, nothing describes that the step of storing is based upon a fact of whether the selection indicates an end of input. Nothing in the rejection of Claim 70 appears to address the issue of storing or sending based upon whether a selection does or does not indicate an end of input. Therefore, the Applicant respectfully submits that each and every element of Claim 70 has not been disclosed by the *Jalili* reference and a Notice of Allowance is respectfully requested.

Applicant has now made an earnest attempt in order to place this case in condition for allowance. For the reasons stated above, Applicant respectfully requests full allowance of the claims as amended. Please charge any additional fees or deficiencies in fees or credit any overpayment to Deposit Account No. 20-0780/PAYT-26,276 of HOWISON & ARNOTT, L.L.P.

Respectfully submitted,
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